



150 Years of Growth!

VIA CERTIFIED MAIL
(Return Receipt Requested)

August 24, 2010

Ms. Rebecca Webber
Director, Air and Waste Management Division
U.S. Environmental Protection Agency
901 N. 5th Street, Kansas City, KS 66101

Mr. James Kavanaugh, Director
Air Pollution Control Program
Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102

RE: NESHAP Initial Notification
FACILITY ID: 079-0027
FACILITY NAME:

Crowder Road (Power) Plant, South Substation, and North Substation
(Crowder Road used to be listed as Facility ID: 079-0010 but is now included with 079-0027 when submitting EIQ's and all three facilities are included in one operating permit)

NAICS Code: 221112

Dear Ms. Webber and Mr. Kavanaugh:

On March 3, 2010, the United States Environmental Protection Agency adopted final amendments to the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63 Subpart ZZZZ. These amendments were effective on May 3, 2010. Pursuant to Section 63.6645(a) and Section 63.9(b), the City of Trenton / Trenton Municipal Utilities submits the following information as its Initial Notification:

1. **Name and address of the owner/operator:**
City of Trenton / Trenton Municipal Utilities
1100 Main Street
PO Box 108
Trenton, MO 64683
660-359-2281
2. **Address of the affected source (i.e. the physical location of the engine(s) subject to Subpart ZZZZ):**

Crowder Road (Power) Plant
1115 West Crowder Road
Trenton, MO 64683

89 115

South Substation
1st Street and Johnson Drive
Trenton, MO 64683

20 110

City of Trenton
Trenton Municipal Utilities
1100 Main St
Trenton MO 64683
660-359-2281
fax: 660-359-2284
www.trentonmo.com

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North Substation

921 Industrial Drive
Trenton, MO 64683

9X117

3. **Identification of the relevant standard and compliance date:** Subpart ZZZZ standards for existing RICE at area sources and May 3, 2013.
4. **Description of the affected sources:**

All three of the plants listed below are part of the Facility ID's referenced above.

Crowder Road (Power) Plant (1115 West Crowder Road) – *At this time we anticipate that the units are our Crowder Road (Power) Plant will all be taken out of service after the effective date of this rule but we are still considering the options available so therefore they have been included in the list sources affected in case we opt to keep them in service after the effective date.*

Unit 1: Fairbanks model 33-D-16 4 cylinder, 650 horsepower
Unit 2: Fairbanks model 33-D-16 4 cylinder, 650 horsepower
Unit 4: Fairbanks model 33-F-16 7 cylinder, 1400 horsepower
Unit 5: Fairbanks model 33-F-16 8 cylinder, 1600 horsepower
Unit 6: Superior model 80-GDSX 8 cylinder, 1769 horsepower
Unit 7: Superior model 80-EX 8 cylinder, 1440 horsepower
Note: Unit 7 is still in place but out of service starting August 2010.

South Substation (1st Street and Johnson Drive)

Unit 1: Caterpillar model 3516 Genset 16 cylinder, 2593 horsepower
Unit 2: Caterpillar model 3516 Genset 16 cylinder, 2593 horsepower
Unit 3: Caterpillar model 3516 Genset 16 cylinder, 2593 horsepower
Unit 4: Caterpillar model 3516 Genset 16 cylinder, 2593 horsepower
Unit 5: Caterpillar model 3516 Genset 16 cylinder, 2593 horsepower
Unit 6: Caterpillar model 3516 Genset 16 cylinder, 2593 horsepower
Unit 7: Caterpillar model 3516 Genset 16 cylinder, 2593 horsepower

North Substation (921 Industrial Drive)

Unit 1: Electro Motive Diesel model MP 645 20 cylinder, 3600 horsepower
Unit 2: Electro Motive Diesel model MP 645 20 cylinder, 3600 horsepower
Unit 3: Electro Motive Diesel model MP 645 20 cylinder, 3600 horsepower
Unit 4: Electro Motive Diesel model MP 645 20 cylinder, 3600 horsepower
Unit 5: Electro Motive Diesel model MP 645 20 cylinder, 3600 horsepower

5. **Types of HAPs emitted by affected source:** Benzene, toluene, xylenes, 1,3-butadiene, formaldehyde, acetaldehyde, acrolein, some polycyclic aromatic hydrocarbons and other trace organic compounds.
6. **Major or Area Source:** Area.

The City of Trenton / Trenton Municipal Utilities will be considering the operation of RICE at the facility that are exclusively used for emergencies and meet the definitions outlined in 40 C.F.R. Part 63 Subpart ZZZZ. These RICE are not subject to emission controls but are listed below for purpose of reference:

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Unit 7: Superior model 80-EX 8 cylinder, 1440 horsepower

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In addition to the units listed above the City of Trenton / Trenton Municipal Utilities also operates other RICE that are used exclusively for emergencies and they will continue to be operated only in the event of an emergency. While not required to provide a listing of those location we are doing so as an aid for compliance with the rule in the future. The current locations with emergency only RICE include the wastewater treatment plant, one sanitary sewer lift station, and the fire station. We are considering the installation of similar systems at the water treatment facilities and additional lift stations.

If you have any questions regarding the above, please do not hesitate to contact Kerry Sampson, City Administrator at cityadmin@trentonmo.com or 660-359-4310.

Sincerely,



Kerry Sampson
City Administrator

Cc: Chad Davis, Utility Director
Steve Sims, Power Plant Supervisor
Rosetta Marsh, Comptroller

pc: MDNR Regional Field Office